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**VIA HAND DELIVERY**

Honorable Colm F. Connolly  
J. Caleb Boggs Federal Building  
844 N. King Street, Unit 31  
Room 4124  
Wilmington, DE 19801-3555

**Re:   Morgan C. Huntley v. VBIT Technologies Corp., et al**  
**D. Del. Case No. 1:22-cv-01164-CFC**

Dear Judge Connolly:

I write as counsel to plaintiff Morgan C. Huntley ("Plaintiff") to request a pretrial conference in this action.

Plaintiff initiated this action by filing a Complaint on September 2, 2022. To date, defendants VBIT Technologies Corp., VBIT Mining LLC, Danh Cong Vo, Katie Vo, and Sean Tu have been served. An offer of service extended to Jin Gao is outstanding. Given the nature of Plaintiff's claims, there is uncertainty as to whether service on the remaining defendants, Lillian Zhao and Advanced Mining, is possible. Plaintiff requests that the Court schedule an initial pretrial conference so that Plaintiff may thereafter engage in discovery for the purpose of, among other things, confirming the existence of, locating, and serving the remaining defendants.

I ask that the conference be scheduled as soon as practicable given Plaintiff's urgent need to effectuate service on all defendants.

Respectfully submitted,

*/s/ Sally E. Veghte*

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cc:   Ronald P. Golden, Esq. (rgolden@bayardlaw.com)  
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